Comment on GN 25-133

RE: **Delete everything in 47 CFR that's not directly related to equipment authorization.**

Wireless devices are becoming increasing more complex. Locating, let alone navigating through the complex technical requirements is unnecessarily complicated by interspersed unrelated content. The technical requirements are intwined with unrelated issues such as station licensing, tower lighting, competitive bidding procedures, etc. The equipment authorization verbiage used in each rule part is inconsistent with other rule parts. The applicable technical requirements and authorization requirements for any particular device are difficult to locate and even more difficult to apply.

The FCC's spectrum branch already deals with spectrum auctions and bidding procedures. Why do these procedures need to be intertwined within the technical requirements for equipment authorization? Since regional operation of transmitters in each band of operation is already governed under FCC spectrum licensing branch, why keep these procedures intertwined with the equipment authorization requirements? Instead, allow the FCC;s spectrum licensing branch to publish the spectrum authorization and registration requirements in a separate set of concise requirements.

The FCC's tower registration branch (ASR), already has requirements for reporting, station logs and tower lighting. Why keep procedures associated with tower registration ensnared with those of equipment authorization? Instead, allow the FCC;s tower registration branch to publish the tower registration requirements in a separate set of concise requirements.

By segregating the equipment authorization requirements for radiocommunication devices, the FCC can more effectively manage the technical requirements for equipment authorization separately from other aspects such as equipment operation (authority to transmit), spectrum bidding, or tower registrations. By separating the FCC Equipment Authorization requirements, equipment manufacturers can locate and apply the necessary requirements. By separating the FCC spectrum licensing requirements, equipment operators can locate and apply the necessary requirements.

Creating specific requirements for each aspect of the FCC reduces the burden on government employees, decreases the time and governmental cost necessary to update the rules, and creates better transparency on the various aspects of managing radiocommunication devices.

Respectfully submitted,
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